

SECURITIES AND EXCHANGE COMMISSION,

V.

Defendants,

- AND -

Relief Defendants.

WHEREAS, the Court entered a October 9, 2013 Temporary Restraining Order as to all Defendants and Relief Defendants, freezing assets, enjoining them from destroying evidence, ordering an accounting and providing other emergency relief;

WHEREAS, the Court entered an Order on November 19, 2013 entering a preliminary injunction, asset freeze and other relief (the “Preliminary Injunction”) as to defendants Toni Tong Chen (“Chen”) and Cheongwha “Heywood” Chang (“Chang”);

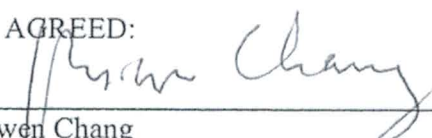
WHEREAS, the Preliminary Injunction permitted defendants Chen and Chang and Relief Defendants Arcadia and HTC to seek reasonable relief from the Preliminary Injunction;

WHEREAS, Plaintiff Securities and Exchange Commission ("SEC") has agreed with defendants Chen and Chang regarding a fourth modification to the Preliminary Injunction; and

NOW, THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED that the Preliminary Injunction is modified for the fourth time as follows:

Defendants Chen and Chang shall be permitted to use the real property located at 823-E East Newmark Avenue, Monterey Park, CA 91755 as collateral for the purpose of posting bail in Case No.: 15-1516M, Central District of California.

SO AGREED:


Peiwen Chang
Cogswell Nakazawa & Chang, LLP
444 West Ocean Blvd.
Suite 1410
Long Beach, CA 90802
Tel: (562) 951-8668
peiwen_chang@cnc-law.com

*Counsel for Defendants Toni Tong Chen
and Cheongwha Chang and Relief
Defendants Arcadia Business Consulting,
Inc. and HTC Consulting LLC*

Dated: August 20, 2015


Daniel J. Maher (admitted *pro hac vice*)
Assistant Chief Litigation Counsel
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549
Tel: (202) 551-4737
Fax: (202) 772-9227
maherd@sec.gov

*Counsel for Plaintiff Securities and
Exchange Commission*

Dated: August 20, 2015

SO ORDERED:


Hon. Roslynn R. Mauskopf
United States District Judge
8/20/2015

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on August 20, 2015, a true and correct copy of the

STIPULATION AND [PROPOSED] ORDER MODIFYING THE PRELIMINARY INJUNCTION ENTERED AGAINST DEFENDANTS CHEONGWHA "HEYWOOD" CHANG AND TONI TONG CHEN

was filed with the Clerk of the Court and served on the below by ECF in accordance with the Federal Rules of Civil Procedure, and the Eastern District's Rules of Electronic Service upon the following counsel of record:

Daniel J. Maher, Esq.
Stacey Bogert, Esq.
Devon Staren, Esq.
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549
maherd@sec.gov
bogerts@sec.gov
starend@sec.gov
Attorneys for Plaintiff Securities and Exchange Commission

Michael Joseph Frevola, Esq.
Francis Robert Denig, Esq.
Holland & Knight
31 West 52nd Street
New York, NY 10019
michael.frevola@hklaw.com
robert.denig@hklaw.com
Attorneys for Heidi Mao Liu (AKA "Heidi Mao")

Jacob Frenkel
Shulman, Rogers, Gandal, Pordy & Ecker, P.A.
12505 Park Potomac Avenue, 6th Floor
Potomac, MD 20854
jfrenkel@shulmanrogeres.com
Attorneys for Rayla Melcher Santos (aka "Teacher Sam")

John Golaszewski, Esq.
Allan Schiller, Esq.
Schiller Law Group, P.C.
130 West 42nd Street, Suite 1002
New York, NY 10036
jg@asfirm.com
as@asfirm.com
Attorneys for Daliang ("David") Guo, Joan Congyi Ma (aka "JC Ma"), Wen Chen Hwang (aka "Wendy Lee"), Yao Lin, Rosanna LS Inc., Ouni International Trading Inc., EZ Stock Club Corp., E Stock Club Corp., Chih Hsuan ("Kiki") Lin and USA Trade Group Inc.

hshern@hotmail.com
florence_leung@hotmail.com
Flat E, 5/F Hilton Tower
96 Granville Road
Tsim Sha Tsui
Hong Kong, China
Service for:
CKB168 Holdings Limited
CKB168 Limited
WIN168 Biz Solutions Limited
CKB168 Biz Solution Inc.
Cyber Kids Best Education Limited
Hung Wai ("Howard") Shern
Rui Ling ("Florence") Leung

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 20, 2015


Melissa Ackerman